

PHILLIP A. TALBERT
Acting United States Attorney
ROBERT J. ARTUZ
Special Assistant U.S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALYSSA MARIE JONES, and
EBONY CHANEL JONES

Defendants.

CASE NO. 2:21-CR-0093-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: July 12, 2021
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

This case was previously set for a status conference on July 12, 2021. The government and Defendants Alyssa Marie Jones and Ebony Chanel Jones's undersigned counsel (the "parties") now seek to continue the status conference to September 20, 2021 and exclude time under the Speedy Trial Act and Local Code T4 for reasons stated below including defense preparation.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 12, 2021.
2. By this stipulation, defendants now move to continue the status conference to September 20, 2021 at 9:00 a.m., and exclude time between July 12, 2021, and September 20, 2021, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:

1 a) The government is in possession of over 30 GB of data that is currently being
2 processed as discovery for production this month in this case. This data includes, for example,
3 law enforcement reports, CDCR reports, EDD records, bank records, surveillance photos, jail
4 call recordings, interview recordings, cellular phone extractions, and social media posts. All this
5 discovery has been either produced directly to counsel and/or made available for inspection and
6 copying.

7 b) Counsel for defendants desires additional time to review the current charges,
8 review the discovery, conduct research and investigation into the charges and alleged acts,
9 consult with their clients, and otherwise prepare for trial.

10 c) At this time, the defendants have no objection to the Court continuing the status
11 conference and agrees that this date is necessary for effective preparation as outlined below.

12 d) Counsel for defendants believe that the requested continuance will provide them
13 reasonable time necessary for effective preparation, considering the exercise of due diligence.

14 e) The government does not object to the amount of time that the defense needs for
15 effective trial preparation.

16 f) Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendants in a trial within the
18 original date prescribed by the Speedy Trial Act.

19 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 et seq., within which trial must commence, the time period of July 12, 2021, to September 20,
21 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis
23 of the Court's finding that the ends of justice served by taking such action outweigh the best
24 interest of the public and the defendants in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 7, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ ROBERT J. ARTUZ
ROBERT J. ARTUZ
Special Assistant U.S. Attorney

Dated: July 7, 2021

/s/ Shari Rusk
SHARI RUSK
Counsel for Defendant
ALYSSA MARIE JONES


Dated: July 7, 2021

/s/ Daniel Olmos
DANIEL OLMOS
Counsel for Defendant
EBONY CHANEL JONES

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED.

Dated: July 7, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE